

**BEFORE**

**THE PUBLIC SERVICE COMMISSION OF**

**SOUTH CAROLINA**

**DOCKET NO. 2021-88-E**

In the Matter of:	)	<b>Dominion Energy South Carolina's</b>
Dominion Energy South Carolina,	)	<b>First Set of Written Interrogatories</b>
Incorporated's Avoided Cost Proceeding	)	<b>and Request for Production of</b>
Pursuant to S.C. Code Ann. Section	)	<b>Documents and Things to London</b>
58-41-20(A)	)	<b>Economics International, LLC</b>
	)	

Pursuant to South Carolina Regulation 103-833, Dominion Energy of South Carolina, Inc. (DESC) respectfully submits its First Set of Written Interrogatories and Requests for Production of Documents and Things to London Economics International, LLC (LEI).

## Instructions

1. Responses should be provided within 20 days<sup>1</sup> in writing and under oath, as specified in Regulation 103-833.
2. These requests are continuing in nature and require you to supplement or amend your answer in a timely manner if you learn that the answer is incorrect or incomplete or if you identify additional documents or information responsive to the request.

<sup>1</sup> While LEI's responses are due within 20 days as specified in Regulation 103-833, the undersigned respectfully requests that LEI provide responses to the extent it is able to do so by September 16, 2021, the same date that LEI has been directed by Order No. 2021-520 to file its Consultant's Independent Report.

3. Where knowledge, information, or documents are requested, such request encompasses knowledge, information, or documents in your possession, custody, or control, or in the possession, custody, or control of your staff, agents, employees, representatives, expert witnesses and consultants, and, unless privileged, attorneys.

4. If you object to a portion of any request, state the grounds of your objection with specificity and answer the remainder of the request. Objections on account of vagueness should specifically explain why you believe the request is vague and should state your understanding of the information being sought along with a response consistent with your understanding.

5. For every page produced to DESC that contains confidential information, the page is to be marked “CONFIDENTIAL” in the header. Any specific information which you designate as confidential information must also be marked by notation, highlighting, or other conspicuous means.

6. “LEI” means London Economics International, LLC.

7. “You” or “your” refers to London Economics International, LLC.

7. “Company” or “DESC” means Dominion Energy South Carolina.

7. “Consultant’s Report” is the “Consultant’s Independent Report” referenced in Commission Order No. 2021-520 in Docket No. 2021-88-E to be produced by London Economics International, LLC and that must be filed with the Commission in the aforesaid docket not later than September 16, 2021.

### **Document and Information Requests**

**DESC 1-1.** Please provide a list of the names of the witness(es) LEI intends to present and the subject matter for which each witness intends to testify at the hearing in this docket and please produce a current curriculum vitae for each such witness(es).

**DESC 1-2.** Please provide copies of any exhibits your witness(es) intends to use in support of his or her testimony in this proceeding or that you otherwise intend to submit in this docket, if any.

**DESC 1-3.** Please provide copies of all documents, workpapers, data, analyses, articles, reports, regulatory decisions, Microsoft Excel copies (with formulas intact), and other materials used in the development and preparation of your witness(es) testimony in this docket.

**DESC 1-4.** Please provide all documents, workpapers, data, analyses, articles, reports, regulatory decisions, Microsoft Excel copies (with formulas intact), and other materials used to support all findings, conclusions, or positions taken in the Consultant's Report or otherwise used in the development and preparation of the Consultant's Report.

**DESC 1-5.** Please provide copies of all source documents, articles, cited documents listed in footnotes, regulatory decisions, and other sources used in the development and preparation of the Consultant's Report.

**DESC 1-6.** To the extent not produced in response to DESC 1-4, please provide in original format—i.e., pdf, Excel (with all formulas intact), or Word—all documents, analyses, articles, reports, regulatory decisions, and other materials supporting the testimony of any witness on behalf of LEI or related to any findings, conclusions, or

positions taken in the Consultant's Report that analyzes, discusses, or proposes adjustments to any of the calculations, adjustments, amounts, or other information set forth in the application or otherwise proposed by the Company in this docket.

**DESC 1-7.** Please provide copies of any correspondence, requests for information, and responses, oral or written, including but not limited to those made or received in electronic format, to or from any party or intervenor (other than DESC) in this docket.

**DESC 1-8.** Please provide copies of all discovery responses provided by LEI in this docket to any party or intervenor (other than DESC) in response to any interrogatory or request for the production of documents and things.

**DESC 1-9.** Please provide copies of documents and materials sufficient to show all findings, positions, and conclusions reached by LEI in the Consultant's Report based on the evidence in the record in Docket No. 2021-88-E.

**DESC 1-10.** Please provide copies of documents and materials sufficient to show what evidence from the record in Docket No. 2021-88-E that LEI used to support all findings, positions, and conclusions reached by LEI in the Consultant's Report.

**DESC 1-11.** Please provide copies of documents and materials sufficient to show what evidence from the record in Docket No. 2021-88-E that LEI (i) approved for inclusion in production and modeling forecasts or otherwise approved for use in calculating avoided cost or (ii) rejected or believed was inappropriate for inclusion in production and modeling forecasts or otherwise disapproved for use in calculating avoided cost.

**DESC 1-12.** Please provide copies of documents and materials sufficient to show all assumptions made and models run by LEI and any proprietary or publicly available

databases used by LEI in the preparation and development of the Consultant's Report. If any proprietary database is used, please provide access to that database to DESC under the terms of an appropriate confidentiality or non-disclosure agreement.

Respectfully submitted,

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